H. Brandon Jones State Bar. I.D. No. 24060043 Joshua N. Eppich State Bar I.D. No. 24050567 **BONDS ELLIS EPPICH SCHAFER JONES LLP** 420 Throckmorton Street, Suite 1000 Fort Worth, Texas 76102 (817) 405-6900 – Telephone

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ATTORNEYS FOR GULF STATES TOYOTA, INC.

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS LUBBOCK DIVISION

In re:	
REAGOR-DYKES MOTORS, LP, et al.	Case No. 18-50214-rlj-11 Jointly Administered
Debtors,	Jointly Administered

#### WITNESS AND EXHIBIT LIST

# TO THE HONORABLE ROBERT L. JONES UNITED STATES BANKRUPTCY JUDGE

Gulf States Toyota, Inc. (the "GST"), respectfully submits this Witness and Exhibit List in connection with the hearing on the *Debtor's Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures: (B) Stalking Horse Bidder and Overbid Protections; and (C) Form and Manner of Notices; (II) Scheduling an Auction and Sale Hearing; (III) Approving the Sale of Substantially All the Assets of the Debtors, Free and Clear of All Liens, Claims, Encumbrances and Interests; and (IV) Granting Related Relief (the "Motion"); scheduled in this case for October 5, 2018, at 10:00 a.m., in the Courtroom of the Honorable Robert L. Jones,* 

located at Room 314, U.S. Courthouse, 1205 Texas Avenue, Lubbock, TX 79401 (the "<u>Hearing</u>"), and respectfully designates the following witnesses and exhibits:

## WITNESSES

- 1. A representative of the Debtor;
- 2. Any witness designated or called by another other party; and
- 3. Impeachment or rebuttal witnesses.

#### **EXHIBITS**

Exhibit No.	Document	Offered	Admitted
1	Toyota Dealer Agreement		
2.	Standard Provisions to the Toyota Dealer Agreement		
3.	Extension letters dated October 20, 2017 and April 15, 2018		

GST reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing.

Dated: October 2, 2018 Respectfully submitted,

#### BONDS ELLIS EPPICH SCHAFER JONES LLP

/s/ H. Brandon Jones

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Attorneys for Gulf States Toyota, Inc

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served electronically through the Court's ECF system this 2nd day of October, 2018, to all parties requesting notice pursuant to Bankruptcy Rule 2002, and via email to the parties listed below:

United States Trustee (exbibits included) 1100 Commerce Street Room 976 Dallas, TX 75242 Stephen.McKitt@usdoj.gov

Marcus A. Helt (TX 24052187) (exhibits included) C. Ashley Ellis (TX 00794824) FOLEY GARDERE FOLEY & LARDNER LLP 2021 McKinney Avenue, Suite 1600 Dallas, TX 75201 mhelt@foley.com

/s/ H. Brandon Jones
H. Brandon Jones